

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JAYME GORDON

Defendant

Crim. No. 15-CR-10390-PBS

GOVERNMENT'S PROPOSED JURY VOIR DIRE

The United States asks that the Court ask prospective jurors the following voir dire questions:

1. The attorneys for the United States in this case are Amy Harman Burkart and Adam Bookbinder. Ms. Burkart and Mr. Bookbinder are Assistant U.S. Attorneys with the U.S. Attorney's Office in Boston. Do you, a member of your family, or a close friend know Ms. Burkart or Mr. Bookbinder?

2. The Assistant U.S. Attorneys may be assisted during trial by Scott McGaunn, who is a Special Agent at the Federal Bureau of Investigation. Do you, a member of your family, or a close friend know Special Agent McGaunn?

3. Do you have any strong feelings about the FBI that might influence your consideration of the evidence in this case?

4. Have you, a member of your family, or anyone close to you ever had any dealings with the federal government, including the agencies I mentioned (the U.S. Attorney's Office and the FBI), whether favorable or unfavorable, which might influence your consideration of the evidence in this case?

5. The defendant is represented by Jeffrey Denner, of Jeffrey Denner Associates, PC.
Do any of you, a member of your family, or a close friend know Mr. Denner or his firm?

6. The defendant's name is Jayme Gordon. Do any of you, a member of your family, or a close friend know Mr. Gordon?

7. The defendant is charged with attempting to defraud DreamWorks Animation, Inc., a California animation studio. Have you, a member of your family, or a close friend ever worked for DreamWorks?

8. What follows is a list of names of other people who may be witnesses in this case or whose names may come up in testimony. Do you, a member of your family, or a close friend know any of these people, companies, or law firms?

[Read the witness lists] add:

The law firm of Fish & Richardson

The law firm of Loeb & Loeb

The law firm of Foley Hoag & Elliot

Paramount Pictures, Inc.

Kenneth Partello, formerly of Randolph, Massachusetts

9. Have you, a family member, or someone close to you ever been involved in the criminal justice system, either as a prosecutor, defense attorney, employee of a prosecutor's office or defense attorney, probation officer, court officer or court clerk?

10. Have you, a family member, or someone close to you ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime?

11. Have you, a family member, or someone close to you had an experience, favorable or unfavorable, with a law enforcement official or with the criminal justice system that might influence your consideration of this case?

12. The indictment in this case alleges that Mr. Gordon participated in a fraud scheme involving a civil copyright infringement suit that he filed, in which he claimed that DreamWorks stole key aspects of the movie Kung Fu Panda from him. Do you have views about or experiences with the copyright or intellectual property laws that might influence your consideration of this case?

13. Have you, a family member, or someone close to you been either a plaintiff or a defendant in a civil lawsuit?

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Adam Bookbinder
Amy Harman Burkart
Adam Bookbinder
Assistant U.S. Attorneys
U.S. Attorney's Office

CERTIFICATE OF SERVICE

I hereby certify that I served a copy this pleading by electronic filing on counsel for the defendant.

Dated: October 7, 2016

/s/ Adam Bookbinder